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MAYOR AND COUNCIL

MEMORANDUM

TO: Mayor and Council

FROM: Susie Byrd, City Representative, District #2

DATE: March 14, 2011

RE: Agenda Item 12A – Back up

Susie Byrd

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Dear Mayor and Council:

Item 12A is an update from City Staff and TXDOT on the status of the Comprehensive Mobility Plan. The Transmountain West project is part of the Comprehensive Mobility Plan. TXDOT is in the process of gathering public comment on the Environmental Assessment for the Transmountain West project.

I became aware of new information this week that is different than what was reported to us by TXDOT and different than what is reported in the Environmental Assessment.

As you recall during our public hearing on the Environmental Assessment on March 5, 2010, TXDOT indicated that the current traffic volumes on Transmountain today is 17,000 cars per day. TXDOT estimated that in 2015 when the project is completed the car volume would increase to 40,000, a 57% increase in traffic volumes. TXDOT estimates that in 2035 the car trips per day would increase to 71,000. (This information can be found on page 11 of the Environmental Assessment. These were also the numbers that TXDOT reported to us at the public hearing. My understanding is that the basis for their estimates is the Transborder Metropolitan Plan which was adopted by the Transportation Policy Board on November 16, 2007. The Transborder MTP has been replaced by the Mission MTP which was adopted on August 10, 2010.)

TXDOT used these traffic estimates in the Environmental Assessment to determine that the only alternative that could handle these volumes of traffic was a freeway (The Alternatives Analysis is described on pages 11-23 of the Environmental Assessment).

***TXDOT did not use the most current traffic estimates available for Transmountain Road in the alternatives analysis for the Environmental Assessment.***

**NEW INFORMATION.** Below is the information provided to me by Roy Gilyard, the director of the El Paso Metropolitan Planning Organization. The most current data available is from the Mission MTP which was adopted by the Transportation Policy Board on August 5, 2010.

| <b>TRAFFIC ESTIMATES FOR TRANSMOUNTAIN WEST</b>    |        |        |        |
|----------------------------------------------------|--------|--------|--------|
| <b>TRANSBORDER METROPOLITAN PLAN</b>               |        |        |        |
| Adopted by the Transportation Policy Board in 2007 |        |        |        |
| Network year                                       | 2015   | 2025   | 2035   |
| Total flow                                         | 33,000 | 47,000 | 60,000 |

| <b>TXDOT ESTIMATES USED IN THE ENVIRONMENTAL ASSESSMENT</b> |        |      |        |
|-------------------------------------------------------------|--------|------|--------|
| EA indicates that these numbers were developed in 2009      |        |      |        |
| Network year                                                | 2015   | 2025 | 2035   |
| Total flow                                                  | 40,000 | na   | 71,000 |

| <b>MISSION METROPOLITAN PLAN</b>                             |        |        |        |
|--------------------------------------------------------------|--------|--------|--------|
| Adopted by the Transportation Policy Board on August 5, 2010 |        |        |        |
| Network year                                                 | 2020   | 2025   | 2035   |
| Total flow                                                   | 18,000 | 19,000 | 31,000 |

As you can see, the new numbers are half of what TXDOT used in their alternatives analysis. TXDOT is proposing to build a freeway to accommodate 71,000 car trips when the latest traffic estimates indicate that there will only by 31,000 car trips by 2035.

**TOO MUCH ROAD FOR DEMAND?** TXDOT is required by federal law to consider alternatives. In their alternatives analysis, they compared the performance of a freeway to the performance four other alternatives, including an arterial and a boulevard. TXDOT analyzed the difference between these alternatives in terms of travel time, average speed, and levels of service for the corridor as well as for the intersections. (A summary of this analysis is on page 20 of the Environmental Assessment.) The problem with their analysis is that they use numbers twice the size of recent estimates to determine that the only alternative that should be considered is a freeway. Using 71,000 car trips per day, TXDOT eliminated all of the alternatives as inadequate to the task of moving that many cars.

If they had used the more recent numbers, both the arterial and the boulevard would perform well, as arterials and boulevards are routinely built to successfully handle these volumes. I've asked Mr. Berry with TXDOT to redo the analysis with the most recent numbers in order to give City Council, the public and FWHA a more accurate analysis of the alternatives.

Given the fact that there are so few dollars available for funding transportation projects, it seems like a waste of precious few dollars to build a road to handle twice the amount of traffic that is projected.

**AIR QUALITY.** The El Paso region is in non attainment for particulate matter (PM10) and in some areas of the city for carbon monoxide (CO). Under the federal air quality rules this means that the City cannot build any transportation facility which would add more pollutants than what has been budgeted by the Environmental Protection Agency (EPA). It also means that every four years, the El Paso Metropolitan Planning Organization (MPO) has to update our Metropolitan Transportation Plan (MTP), which is a document that reviews current demographic data and its impact on transportation demand. As part of the MTP process, the MPO models the air quality based on all of the planned transportation projects. The MPO has to prove that completing these new transportation projects will not add additional pollutants beyond what has been budgeted for the region.

The proposed project was listed in the Transborder MTP but had a different scope. The scope in the old MTP included building a climbing lane in the eastbound direction. In order to pursue the full blown freeway project, TXDOT had to make sure the project was current with the MTP and the Transportation Improvement Plan (TIP) to ensure that it was in compliance with air quality standards. The most current MTP is the Mission MTP adopted on August 5, 2010. That MTP only shows 31,000 car trips per day on

Transmountain. 31,000 car trips per day was modeled for conformity with our air quality budget. From page 36 of the Environmental Assessment, "With the January 28, 2011 conformity determination, FHWA determined that the existing transportation network, **plus the planned projects** in the 2035 MTP, would not exceed the emission budgets in the SIP."

Since TXDOT is proposing to build a road that will accommodate twice the traffic that is projected and that will therefore have twice the impact on air quality, I am concerned that we do not know the full impact on air quality. I am working with a conformity specialist from the EPA to determine whether building a road that has twice the capacity of what has been modeled for conformance with air quality standards is appropriate.

**Council Action.** I would like to request that we formally ask TXDOT to update their alternatives analysis with the most current information available and that we not take any action (either the gift of our right of way or supporting any of the alternatives) until the alternatives analysis is updated.